

FCC Notice of Proposed Rulemaking, WC Docket No. 02-60

We thank the FCC for the opportunity to comment on proposed changes to the above docket.

The Fletcher Allen Telemedicine Program in affiliation with the University of VT College of Medicine covers all of VT and Upstate NY. Vermont , 49th in the US in population, has the largest percentage of its population (approx. 68%) living in rural areas. We are involved not only in clinical teleconsultations and medical education/distance learning but are funded currently by two federal grants to produce protocols for rural teletrauma and ambulance telecare. Our telemedicine network has twice been rated as one of the TOP Ten Telemedicine Networks in the nation. In spite of this success, our telemedicine program's sustainability is always in financial question due to huge telecommunications costs needed to help subsidize the small rural hospitals in our network. We completely support the proposed rule changes stated in the docket 02-60. However, we will focus our comments on Section C: Calculation of Discounted Services, since if changes are not made in this area, we see no way that our VT/NY Network will receive any benefits whatsoever from the RHC Support Mechanism.

For two years we have spent countless hours filing applications for all our sites only to discover that we probably cannot qualify for any significant reimbursement from this program. First, ISDN line charges in VT are not distant sensitive, VT urban rates are the same as rural rates. T-1 lines are out of the question due to very high cost. What is worse, contrary to what the Commission assumed, our state does not have even one city of 50,000 population. Therefore, our telecommunication rates do not reflect the economies of scale and scope of a more densely populated area, which could at least give reasonable urban rates to use for comparison.

It is critical to our ongoing ability to provide adequate care to all the rural areas in our region that a different method of calculating reimbursement be used, possibly based on functionality or equivalent bandwidth rather than on the current method of comparing technically similar services.

Thank you for your consideration of this problem.

Sincerely,

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